## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

JOSEPH S. BEALE,	
Plaintiff,	)
V.	)
REVOLUTION PORTFOLIO, LLC, SECURITY LIFE OF DENVER	) Case No. 07 CV 6909
INSURANCE COMPANY d/b/a ING, ARKIN YOUNGENTOB ASSOCIATES,	) Judge Kocoras
LLC and STUART YOUNGENTOB,	) Magistrate Judge Valdez
Defendants,	)
REVOLUTION PORTFOLIO, LLC,	)
Counter Plaintiff,	)
V.	)
JOSEPH S. BEALE,	)
Counter Defendant.	)

## **NOTICE OF MOTION**

To: See Attached Service List

PLEASE TAKE NOTICE that on July 22, 2008 at 9:30 a.m., or as soon thereafter as counsel may be heard, we shall appear before the Honorable Charles P. Kocoras, or any judge sitting in his stead, in the United States District Court for the Northern District of Illinois, Room 1725, Chicago, Illinois, and then and there present the Unopposed Motion of Arkin Youngentob Associates, LLC and Stuart Youngentob for Extension of Time to Respond or Otherwise Plead to Plaintiff's First Amended Complaint, a copy of which is served upon you herewith.

Respectfully submitted, Arkin Youngentob Associates, LLC and Stuart Youngentob,

By:

/s/ Martin Q. Ryan
One of the Attorneys for
Arkin Youngentob Associates, LLC
and Stuart Youngentob,

Martin Q. Ryan David A. Baugh Baugh, Carlson & Ryan LLC 55 W. Monroe St., Suite 600 Chicago, Illinois 60603 312/759-1400

## **SERVICE LIST**

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## **Certificate of Service**

Martin Q. Ryan, an attorney, hereby certifies that, on July 3, 2008, he caused a true and correct copy of the foregoing NOTICE OF *UNOPPOSED MOTION OF ARKIN YOUNGENTOB ASSOCIATES, LLC AND STUART YOUNGENTOB FOR EXTENSION OF TIME TO RESPOND OR OTHERWISE PLEAD TO PLAINTIFF'S FIRST AMENDED COMPLAINT* to be filed electronically with the Court's CM/ECF system, and that notice of this filing was sent by electronic mail to all parties listed on the attached Service List by operation of the Court's electronic filing system or by mail to anyone unable to receive electronic filings as indicated in the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF system.

/s/ Martin Q. Ryan Martin Q. Ryan